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*Attorney for Defendant BRANDON JIMENEZ*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

United States of America,  
  
Plaintiff,

v.

PCPLV LLC d/b/a Pinnacle Compounding  
Pharmacy, Ofir Ventura, Cecelia Ventura,  
Brandon Jimenez, Robert Gomez, Gomez &  
Associates, Inc., Rock'n Rob Enterprises,  
Amir Shalev, D.P.M., AS Enterprises, Inc.,  
and Ivan Lee Goldsmith, M.D.,  
  
Defendants.

Case No. 2:21-cv-00184-JCM-DJA

**JOINT MOTION FOR EXTENSION OF  
TIME  
(THIRD REQUEST)**

Plaintiff UNITED STATES OF AMERICA and Defendants PCPLV LLC, OFIR VENTURA, CECELIA VENTURA, and BRANDON JIMENEZ ("Defendants"), by and through their counsel, hereby jointly move the Court to extend the time for Defendants to file an answer or other responsive pleading to Plaintiff's complaint by an additional 14 days. This is the third request to extend this deadline and is based on the following:

1. On October 3, 2023, this Court extended by 60 days, up through and including January 26, 2024, Defendants' time to file an answer or other responsive pleading to Plaintiff's complaint. This was the first extension of time of this deadline.

2. The Court subsequently, on the parties' joint motion, extended the January 26

1 deadline by an additional 21 days, up through and including February 16, 2024. The parties  
2 requested this extension to aid their ongoing settlement discussions.

3 3. The parties continue to engage in settlement discussions and believe that extending  
4 the responsive pleading deadline by an additional 14 days, up through and including March 1,  
5 2024, is necessary to enable the ultimate success of those settlement discussions.

6 4. In the event the Court grants this requested extension and the parties are unable to  
7 reach a settlement agreement in principle by February 29, Defendants would anticipate filing  
8 motions to dismiss the complaint under Federal Rules of Civil Procedure 9(b) and 12(b)(6).

9  
10 DATED: February 8, 2024

Respectfully submitted,

11 BY: /s/ Peter S. Christiansen  
12 PETER S. CHRISTIANSEN, ESQ.  
13 Attorney for Defendants PCPLV LLC,  
OFIR VENTURA, and CECELIA VENTURA

14 BY: /s/ Michael V. Cristalli  
15 MICHAEL V. CRISTALLI, ESQ.  
16 Attorney for Defendant BRANDON JIMENEZ

17 BY: /s/ Summer A. Johnson  
18 SUMMER A. JOHNSON  
19 Assistant United States Attorney  
20 Attorney for Plaintiff UNITED STATES

21 IT IS SO ORDERED:

22 

23 DANIEL J. ALBREGTS  
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: 2/9/2024  
26  
27  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that pursuant to the Fed. R. Civ. Pro. 5(b) on the 8<sup>th</sup> day of February 2024, I caused a true and correct copy of the above and foregoing, to be served via the Court's CM/ECF system, on all parties currently on the electronic service list.

/s/ Tanya Bain  
An Employee of Clark Hill, PLLC